



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

SOUTHWEST REGIONAL OFFICE
400 WATERFRONT DRIVE
PITTSBURGH, PA 15222-4745
(412) 442-4000

FAX NUMBERS

412-442-4194
8-636-4194 (Network)
Regional Director's Office
Admin./Admin. Services
Personnel
Waste Management
Env. Cleanup - HSCA Section
Air Quality Control

412-442-4328
8-636-4328 (Network)
Water Management
Oil and Gas Management
Env. Cleanup - Special Projects
Env. Cleanup - Storage Tanks Section
Central Files
Word Processing

412-442-4303
8-636-4303 (Network)
Water Supply & Community Health
Soils & Waterways Section
Radiation Protection

FAX COVERSHEET

DATE: 8/8/94

TO: Jim Hagedorn 3AT21

EPA Region III

FROM: Steve Hepler Compliance Specialist

PADER/AQC

TOTAL PAGES INCLUDING COVER 2

COMMENTS

*As requested, some comments
re: USX CEM cost/installation
narrative.*

I N T E R O F F I C E M E M O R A N D U M

Date: 04-Aug-1994 02:07pm EDT
From: Joseph C. Nazzaro
NAZZARO,JOSEPH
Dept: Air Quality Control
Tel No: (717) 783-9247

TO: Stephen Hepler

(HEPLER.STEPHEN)

Subject: USX Response

Steve,

As we discussed during our telephone conversation, we cannot guarantee approval of a Phase I submittal within 30 days. Our goal is to respond to the applicant within 30 days, but that response may be "we need more info" or "we're still working on your submittal". The completeness of the submittal plays a large part in the length of time needed to complete a Phase I review.

If the submittal were totally complete, 60 days may be a more realistic time (once again, let me emphasize that we cannot guarantee ANY particular time period).

The "Engineering, Installation and Start-Up" costs quoted seem on the high side, but a lot depends on physical changes/additions needed at the facility.

The "Operation and Maintenance" costs seem reasonable and maybe even a little low (assuming a commitment to operate and maintain the system so as to be in compliance at all times).

As to the alternative monitoring costs, we have no idea what kind of parametric system is in place, nor do we know that it would comply with the requirements we are developing in response to enhanced monitoring issues. Remember, we're not talking about measuring a lot of temperatures, pressures, flows, etc. and then saying "trust us, according to the model we've developed, we know we're in compliance". There is no indication of the representativeness, accuracy, precision, reliability, frequency of data collection or timeliness of the system. They have not quoted any "operation and maintenance" costs, which is an indication that they are not implementing the rigorous quality assurance, record keeping and reporting requirements that would be necessary for a "compliance" system.

The installation schedule USX proposes could be seriously impacted by supply/demand considerations (possibly a reason for high initial costs quoted).

Joe

TOTAL P.002